

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

|   |   |                        |
|---|---|------------------------|
| ROXANN HALL, on behalf of                         | ) |                        |
| herself and all other persons similarly situated, | ) |                        |
| known and unknown,                                | ) |                        |
|   | ) |                        |
| Plaintiffs,                                       | ) |                        |
|   | ) | Case No. 3:21-cv-00055 |
| v.  | ) |                        |
|   | ) |                        |
| MERIDIAN SENIOR LIVING, LLC,                      | ) |                        |
|   | ) |                        |
| Defendant.  | ) |                        |

**DEFENDANT’S MOTION TO DISMISS**

Defendant Meridian Senior Living, LLC respectfully moves this Court pursuant to Federal Rule of Civil Procedure 12(b)(6), for an order dismissing Plaintiff’s Class Action Complaint with prejudice and entering judgment in favor of Defendant. A memorandum in support of this motion is being filed contemporaneously herewith.

Dated: February 22, 2021

Respectfully submitted,

/s/ Erin Bolan Hines

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*Attorneys for Defendant Meridian Senior  
Living, LLC*

**CERTIFICATE OF SERVICE**

I, Erin Bolan Hines, an attorney, hereby certify that on February 22, 2021, I caused a true and correct copy of **DEFENDANT’S MOTION TO DISMISS** to be electronically served on all counsel via the Court’s EC/CMF system.

/s/ Erin Bolan Hines